

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

VS.)

KEITH ERIC SALMON,)

Criminal No: 3:11-00245

MOTION TO CONTINUE

Comes now the defendant Keith Salmon, by and through his attorney Glenn R. Funk, and would respectfully request this Honorable Court continue this case on the grounds:

1. Mr. Salmon and counsel are continuing to work through the discovery and all issues relevant to this case.
2. Counsel and Government are continuing to negotiate the case and ultimately hope to resolve the case on a plea.
3. Mr. Salmon has had psychological evaluation and is receiving treatment that is relevant to this case and any disposition in the case.
4. Defense counsel has spoken with Assistant United States Attorney Lynne Ingram and she does not object to the continuance. Further, Ms. Ingram believes a continuance in this case will give the parties a legitimate chance to reach a settlement.

Respectfully submitted,

/s/ Glenn R. Funk

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Oliver
This motion is granted in the interests of justice to allow further wallow defense counsel to be prepared for trial.
Will go
9-10-12